

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOAN CHARLES, Plaintiff, v. OCWEN FEDERAL BANK FSB, OCWEN FINANCIAL CORPORATION, MASSACHUSETTS PROPERTY INSURANCE UNDERWRITERS ASSOCIATION, and ONE CALL INSURANCE AGENCY, INCORPORATED, Defendants.	CIVIL ACTION NO. 04-11625-RWZ
--	-------------------------------

**THE EMERGENCY MOTION OF THE DEFENDANTS, OCWEN LOAN
SERVICING, LLC AS SUCCESSOR-IN-INTEREST TO OCWEN FEDERAL
BANK, FSB AND OCWEN FINANCIAL CORPORATION FOR A PROTECTIVE
ORDER AGAINST THE PLAINTIFF, JOAN CHARLES**

The Defendants, Ocwen Loan Servicing, LLC as successor-in-interest to Ocwen Federal Bank, FSB and Ocwen Financial Corporation (collectively, "Ocwen") respectfully move this Court, pursuant to Fed. R. Civ. P. 26(c), to enter an order precluding the plaintiff, Joan Charles ("Charles") for taking the deposition of Ocwen. As grounds, Ocwen submits the accompanying Memorandum in Support of its Motion, and states that the Plaintiff's Notice of Deposition served on Ocwen on October 6, 2006, which purports to schedule a deposition of Ocwen on October 17, 2006 violates the Court's July 28, 2006 scheduling order and the applicable discovery deadlines.

WHEREFORE, the Defendants respectfully request this Honorable Court to enter an order precluding the Plaintiff to take the deposition of the Defendants, and to award the reasonable attorneys fees incurred in filing this motion.

Respectfully submitted by,

**DEFENDANTS OCWEN LOAN SERVICING,
LLC AS SUCCESSOR-IN-INTEREST TO
OCWEN FEDERAL BANK FSB AND OCWEN
FINANCIAL CORPORATION**

By their attorneys,

/s/ Christopher J. DeCosta
Paul Michienzie, Esq. - BBO #548701
Christopher J. DeCosta, Esq. – BBO #657527
Michienzie & Sawin LLC
745 Boylston Street, 5th Floor
Boston, MA 02116

Dated: October 12, 2006

REQUEST FOR ORAL ARGUMENT

Pursuant to L.R. 7.1(D), Ocwen respectfully requests an oral argument on its motion, as it believes such oral argument will assist the court in resolution of the matters set forth in the motion.

CERTIFICATE OF SERVICE

I, Christopher J. DeCosta, hereby certify that a true copy of the above document was served upon the attorney of record for each other party by U.S. mail, first class, postage pre-paid on October 12, 2006.

/s/ Christopher DeCosta

Christopher J. DeCosta